

EXHIBIT D

**Declaration of Miles N. Clark in Support of Plaintiffs’
Motion for Class Certification**

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANTHONY SESSA AND MARK SESSA,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ANCESTRY.COM OPERATIONS INC., a
Virginia Corporation; ANCESTRY.COM,
INC., a Delaware Corporation;
ANCESTRY.COM LLC, a Delaware
Limited Liability Company,

Defendants.

Case No. 2:20-cv-22-cv-2292-GMN-BNW

**DECLARATION OF MILES N. CLARK IN
SUPPORT OF MOTION FOR CLASS
CERTIFICATION**

I, MILES N. CLARK, declare as follows:

1. I am an attorney of law, duly licensed and admitted to practice law before the United States District court for the District of Nevada. I am a partner in the law firm of The Law Offices of Miles N. Clark, LLC, which serves as local counsel for Plaintiffs in the matter of *Sessa et al. v. Ancestry.com Operations Inc. et al.*, No. 22-cv-2292-GMN-BNW (D. Nev. 2020) (the “Action”). I make this declaration in support of the Plaintiffs’ Motion for Class Certification.

2. I have personal knowledge of the following facts, and I am competent to testify to the following facts upon my own personal knowledge.

3. I graduated from Cornell Law School in 2011. After graduating from Cornell Law School, I spent four years as a judicial law clerk. I first worked for the Windham Unit of the Vermont Trial Courts (2011-12), then for U.S. Magistrate Judge Karen Wells Roby in the U.S. District Court for the Eastern District of Louisiana (2012-13), and then for U.S. District Judge Jennifer A. Dorsey in the U.S. District Court for the District of Nevada (2013-15). Following my clerkships, I worked as a litigation associate in two Las Vegas law firms: Pisanelli Bice, PLLC and Akerman LLP. In August 2016 I opened the Law Offices of Knepper & Clark LLC, the predecessor to my current firm.

